

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 Part A

Respondent: Donald Albert

Title: Director

REQUEST: CLEC Coalition, Set #2

DATED: May 15, 2001

ITEM: CC 2-9 Please provide the most recent copy of the Nortel Helmsman document as well as the Lucent equivalent.

REPLY: Verizon MA has not referred to the "Nortel Helmsman document" in this case. If the CLEC Coalition provides a more detailed description of this document, Verizon MA will attempt to locate the document if it is in Verizon's possession and it is within the scope of the proceeding.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 Part A

Respondent: Michael Anglin
Title: Director – Service Costs

REQUEST: CLEC Coalition, Set #2

DATED: May 15, 2001

ITEM: CC 2-35 Regarding Verizon's Power Factors:

1. To which USOA account(s) is power equipment booked? Please identify both the account(s) and sub-account(s) to which these investment costs are booked and provide the amount in the account related to power equipment investment. This information should be provided for 1998.
2. Please provide the balance of power equipment investment that was retired in 1998.
3. Of the investment amount identified in (1) what portion relates to power equipment necessary to support newly installed equipment and what portion relates to replacement of existing power equipment (*e.g.*, replacement due to upgrade, obsolescence, defective or worn-out units, *etc.*).
4. Please explain in detail and provide all supporting documentation that demonstrates that BA excluded replacement power equipment in its calculation of its power factors.

- REPLY:**
1. Central Office Power Equipment is booked to the Central Office Plant Account that the power equipment supports. For example, if the power equipment is placed to support digital switching, it is booked to Account 2212.1. If the power equipment is used to support Digital Circuit Equipment, it is booked to Account 2232.1.
 2. This information not readily available and would require a burdensome special study to develop.
 3. See response to (2) above.
 4. See response to (2) above.

VZ # 220

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-1 Please provide the latest version of any internal policy guidelines or procedures regarding wholesale or retail xDSL deployment or line sharing, whether developed by VZ-MA or developed by any other entity and provided to VZ-MA. If new versions of such guidelines or procedures under development or revision, please state when those new versions are expected to be released.

REPLY: Verizon MA does not currently offer retail line sharing. Wholesale line sharing is offered wherever a CLEC requests it by submitting a collocation request via normal procedures. All required information, including collocation application forms, are posted on Verizon's Wholesale Services Web Page.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-4 Please provide a copy of all business process and policy documentation used to determine the need for loop conditioning (if not part of the response to the above data request).

REPLY: Please see Verizon MA's response to Information Request ATT 3-5.

VZ # 278

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Donald Albert
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-10 Please provide copies of engineering and operations policy documentation used to determine the equipment cross connect block locations on central office MDFs including line splitters and line splitter cross connect blocks.

REPLY: The attached file, LS M&P 9-18-00, is the M&P used by Verizon MA's frame personnel which describes the cross connect configurations. Verizon MA considers this document to be proprietary and confidential. This document will be provided to parties subject to the terms of a mutually acceptable Protective Agreement.

Verizon MA has redacted some information to exclude internal Verizon contact phone numbers, internal use only URL and password for Operations reporting and internal work reporting code information.

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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-18 For each item that VZ-MA's Engineering personnel currently research to determine if an unbundled loop is DSL qualified on a competitive carrier's behalf (e.g., splice points, bridge taps, load coils, cable gauge, etc.) please indicate the name of any VZ-MA electronic database that designed to hold that data (e.g., "VZ-MA reviews cable gauge information. LFACS is designed to include cable gauge information.") Please specify if any data that VZ-MA believes is required to qualify an unbundled loop for DSL services is not designed to be included in any current VZ-MA database/system (i.e., if the data is only found on paper records 100 percent of the time). If data resides both on mechanized systems and via paper records, please identify specifically what information resides on each and the extent to which the data, or portions thereof, is included in both.

REPLY: Verizon MA objects to this request on the grounds of that it is unduly burdensome. Notwithstanding this objection, Verizon MA provides the following response.

The bulk of the information necessary to qualify a specific loop resides on paper plant location records. Less than 12 percent of terminals in central offices with collocation in Massachusetts have make-ups on at least one pair in the terminal recorded in the LFACS data base.

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D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-24 Please provide for the last 5 years, the annual growth rate for DSL service in Massachusetts. Please provide all documentation and materials supporting your response.

REPLY: Please see Verizon MA's response to Information Request CC 2-50.

VZ # 298

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-25 Please provide VZ-MA's forecast growth in demand for DSL service in Massachusetts for as long a period as such data is available accounting for the continued rollout of any new DSL service offerings. Please provide all documentation and materials supporting your response

REPLY: Please see Verizon MA's response to Information Request CC 2-51.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-27 Please provide the actual current fill factors for copper feeder and copper distribution in the VZ-MA network in Massachusetts and in each of the Bell Atlantic states. If this data is unavailable for any state, please state that this is the case and provide the data requested for all states where it is available. Please provide all documentation and materials supporting your response.

REPLY: Please see Verizon MA's response to Information Request CC 2-53.

**Verizon New England Inc.
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D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-34 Please provide all documents prepared since January 1, 1995 (including drafts or documents that are not final or approved), discussing or describing possible changes to VZ-MA's telecommunications plant that relate to the provision of wholesale or retail xDSL services. Provide all related documentation, including but not limited to documents describing VZ-MA's planned methodology to provide xDSL services to customers with relatively long loops, with loops that are provided over fiber feeder and xDLC systems, with loops that require "conditioning," or with loops with any other distinguishing characteristic. If VZ-MA-specific documents of this kind do not exist, please provide whatever VZ-MA documents of this kind cover VZ-MA's service area.

REPLY: Verizon MA objects to this request on the grounds that it is overly broad, unduly burdensome and not likely to lead to admissible evidence in this proceeding. Notwithstanding this objection, Verizon MA provides the following response.

Verizon MA does not currently offer retail XDSL service. When Verizon MA did provide that service, it did not offer it on loops greater than 15,000 feet in length or on loops that required conditioning.

Verizon MA has a wholesale offering that allows CLECs to provide XDSL service on fiber fed loops. In addition, Verizon MA has proposed its PARTS (Packet At Remote Terminal Service) offering for fiber fed loops and has agreed to provide updates on this proposed service on its website. To date, Verizon MA has held two industry workshops on its PARTS proposal to share information with interested industry representatives.

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D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-35 Does VZ-MA intend to cancel or otherwise modify any plans referred to in the previous request in connection with its formation of a separate affiliate to provide retail xDSL service in Massachusetts? Has VZ-MA canceled or modified such plans? If the answer to either question is anything other than an unqualified "no," please describe each such cancellation or modification.

REPLY: Verizon MA objects to this request on the grounds that it is irrelevant and is not likely to lead to admissible evidence in this proceeding. Notwithstanding this objection, Verizon MA provides the following response.

Please see Verizon MA's response to Information Request CC 3-34.